

BASS, BERRY & SIMS - PLLC

A PROFESSIONAL LIMITED LIABILITY COMPANY
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MEMPHIS OFFICE:
119 S. MAIN STREET, SUITE 500
MEMPHIS, TN 38103
(901) 312-9100

January 28, 2000

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

**RE: Petition of Yorkville Telephone Cooperative, Inc.
For Approval of An IntraLATA Toll Dialing
Parity Plan, Docket No. 99-00298**

Dear Mr. Waddell:

As per the Tennessee Regulatory Authority's (the "TRA"), Order of August 24, 1999, we are refileing an original and thirteen (13) copies of the IntraLATA Toll Dialing Parity Implementation Plan (the "Plan") of Yorkville Telephone Cooperative, Inc. As directed, the Plan is being filed sixty (60) days prior to its implementation date of March 31, 2000 .

In order to be in compliance with the FCC's rules and regulations and to comply with the TRA's Order of August 24, 1999, the Company:

- (a) On September 22, 1999, notified all carriers operating in West Tennessee of the Company's intent to convert to equal access on March 31, 2000. A copy of the Notice, and the persons to whom mailed, is attached hereto marked "A". Also, the carriers were notified that in order to be on the ballot they had to respond by December 2, 1999.

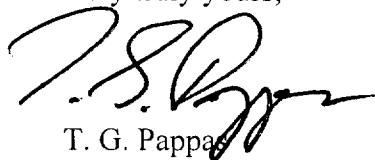
FILE

Mr. K. David Waddell
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- (b) Notified all of its customers in writing of a Carrier Selection Procedure ("Equal Access Balloting" as outlined in Item IV on Page 2 of the Plan), will be accepted and processed "beginning January 24, 2000, to be effective on the implementation date." A copy of the Notice that was mailed to the customers is attached hereto marked "B".

If you have any questions, do not hesitate to contact me or Mr. W. T. Sims, Manager of the Yorkville Telephone Cooperative, Telephone No. (901)643-6121.

Very truly yours,

A handwritten signature in black ink, appearing to read "T. G. Pappas", with a stylized flourish at the end.

T. G. Pappas

TGP/br#2085418

Enclosures

cc: Richard Collier, Esq.
Mr. Joe Werner
Mr. Carsie Mundy
Mr. W. T. Sims
Thomas J. Moorman, Esq.

2 Nebo-Yorkville Rd.
P.O. Box 4268



TEL: 901-643-6121
FAX: 901-643-6600

Yorkville, TN 38389

LTR. SAMPLES
JAN 28 PM 12 29

September 22, 1999

Dear Equal Access Coordinator:

This letter is official notification of intent by Yorkville Telephone Cooperative, Inc. to convert its Brazil (BRZLTNXADS0), Mason Hall (MSHLTNXADS0), Trimble (TRMBTNXADS0) and Yorkville (YRVLTNXADS0), Tennessee exchanges to equal access on March 31, 2000. These offices are, and will remain, behind the BellSouth equal access tandem in Memphis (MMPHTNMA84T), Tennessee. We have employed Cathey, Hutton & Associates, Inc., to perform the Balloting and Allocation process.

In order for your company to be listed on the ballot you must place a firm order for FG-D access to Yorkville Telephone Cooperative, Inc. no later than December 2, 1999. Please mail your Access Service Request (AS) to:

Yorkville Telephone Cooperative, Inc.
P.O. Box 8
Yorkville, TN 38389

or you may fax it to 901-643-6600. Mark all correspondence - Attention: Equal Access Coordinator.

We have enclosed a Pre-subscription and Balloting Time Line and several forms that will need to be completed and returned to us.

Form 101 - Ballot Information.

This should be returned with your FG-D order.

FILE

"A"

Equal Access Coordinator

-2-

September 22, 1999

Form 201 - Allocation Acceptance Form.

This form must be returned no later than February 6, 2000.

Form 301 - Letter of Agency.

This form should accompany any lists of subscribers (end-users) presented to Yorkville Telephone Cooperative, Inc.

Form 401 - Order Form.

This form should be used to order the specific tapes indicated.

Each Interexchange Carrier (IC) participating in the balloting process will have an equal chance of being listed first on the ballot. The order of IC selection for the first ballot will be on a random basis. Thereafter, an equal number of ballots will have each of the remaining ICs listed first on the initial ballot.

If you have any questions, please contact Jim Cherry or Marcella Jost with Cathey, Hutton & Associates at 770-446-7242.

Sincerely,



W. T. Sims
General Manager
Yorkville Telephone Cooperative, Inc.

Enclosures

**8-16-99
EQUAL ACCESS
BALLOT MAILING LIST**

Michael McCrae
Teleport Communications Atlanta, Inc.
One Teleport Drive
Staten Island, New York 10311-1011

David Parker
Parker FiberNet, LCC
1005 Commerce Street
Summerville, Georgia 30747

Timothy R. Graham
WinStar of Georgia, Inc.
Suite 3126
230 Park Avenue
New York, New York 10169

Stephen B. Rowell
ALLTEL Communications, Inc.
One Allied Drive
Little Rock, Arkansas 72202

J. Carl Jackson
IGC Telecom Group, Inc.
Suite 500
50 Glenlake Parkway
Atlanta, Georgia 30328

Cecil L. Davis
NEXTLINK Georgia, Inc. *call 615-777-7777
and find out who
to send to for
Tennessee.*
400 Highland Parkway
Smyrna, Georgia 30082

Steven D. Moses
Interstate Fibernet, Inc.
P.O. Box 510
West Point, Georgia 31833

Laura Foradory
EX Communications Services, Inc.
Suite 821A
11101 Metric Blvd.
Austin, Texas 78758

Steven Stanfill
Network Plus
234 Copeland Street
Quincy, Massachusetts 02169

Eric Budding
Qwest/LCI
4650 Lakehurst Drive
Dublin, Ohio 43016

Rosalin Hines - Equal Access Coordinator
MCI
70717th Street
Denver, Colorado 820202

Earl Tharp, Network Services
One Call Communications
801 Congressional Blvd.
Carmel, Indiana 46032

Jonathan W. Session
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, Virginia 22182

Joseph W. Miller
Vyvx, Inc.
Suite 4100
One Williams Center
Tulsa, Oklahoma 74172

*Ben Duggan
105 Mollay St.
Suite 300
Nashville, TN
37201*

Alwina Gustin - Equal Access Coordinator
AT&T
290 Davidson Avenue
Somerset, New Jersey 08873

James French - LEC Channel Manager
Sprint Communications - Vendor Operations
Group
3rd Floor

903 E. 104th Street
Kansas City, Missouri 64131

Guy Hicks
Rich Patlos - Mgr. Independ. Co. Accts.
BellSouth

2nd Floor - 333 Commerce ST
600 North 19th Street STE 2101
Birmingham, Alabama 35203
Nashville, TN 37210 - 3500

Attn: Network Cost Management
Cable & Wireless Communications, Inc.
8219 Leesburg Pike
Vienna, Virginia 22182

Judy Bruk
Intermedia Communications, Inc.
Suite 500
360 Interstate North Parkway
Atlanta, Georgia 30339

David Overton
Business Telecom, Inc.
Suite 500
4300 Six Forks Road
Raleigh, North Carolina 27609

Michael Van Buren
Frontier Communications Services, Inc.
30300 Telegraph Road
Brigham, Michigan 48025

Steven Brownworth
ITC DeltaCom Communications, Inc.
P.O. Box 510
West Point, Georgia 31833

Rob Gianquinto
TCG
429 Ridge Road
Dayton, New Jersey 08810

Mike Ensrud
The Communigroup of KC
6950 West 56th Street
Mission, Kansas 66202

Bernice Rainosek
Thrifty Call, Inc.
401 Carlson Circle
San Marcos, Texas 75666

Jana Thomas
Telco Communications Group, d.b.a. Dial &
Save
2440 Marsh Lane
Carrollton, Texas 75006

Debbie Vanausdoll, LEC Administrator
WorldCom, Inc.
3rd Floor
12500 San Pedro
San Antonio, Texas 78216

Emanuel DeMaio
The Phone Company
6805 Route 202
New Hope, Pennsylvania 18938

✓
8/14 Kay Schooler
NTS Communications
5307 West Loop 289
Lubbock, Texas 79414

Arthur Wright
Long Distance Management
611 Broadway
Paducah, Kentucky 42001

Julie Trent
Cincinnati Bell Long Distance
Suite 2300
36 East 7th Street
Cincinnati, Ohio 45202

Shayan Sexton
TeleScan
P.O. Box 4747
Johnson City, Tennessee 37602

Sumana Gowda
Corp Telemanagement - LCI International
4650 Lakehurst Court
Dublin, Ohio 43016

Kelly Connor
Coastal Telephone Co.
Suite 800
2 River Way
Houston, Texas 77056

MR. W. T. Sims
manager
Yorkville Communications, Inc.
2 Yorkville-Nebo Rd.
Yorkville, TN 37389



IMPORTANT DEADLINE:
Return enclosed ballot
promptly

Dear Yorkville Telephone Cooperative Customer,

As part of the restructuring of the telephone industry, you have an opportunity to choose the long distance company that will provide your long distance service.

Yorkville Telephone Cooperative will provide you the opportunity to choose an INTRALATA company for calls within the boundaries of an area known as a LATA (Local Access and Transport Area) or what we also refer to as a Telephone Company Zone. You are in the Memphis LATA, bounded on the east by the Tennessee River and on the west by the Mississippi River and running from the southern border of Tennessee to the northern border, generally referred to as West Tennessee. In the past, only BellSouth has handled these calls. All "1+" calls placed to locations outside of your LATA or local Telephone Company Zone have been handled in the past only by AT&T. Now, the long distance company that you choose will handle these calls. Using the enclosed ballot you can choose the same company for both the INTERLATA and INTRALATA or you may choose a different company for each.

On the ballot you will find listed (in random order) the long distance companies that wish to provide you with "1+" long distance service for both INTERLATA and INTRALATA calls. Each company has installed the appropriate equipment that will allow you to direct dial (1 + telephone number) your long distance calls.

Please select the company(ies) to provide your long distance service and return the ballot without delay. Your phone will be connected with your chosen long distance company on the effective service date shown on the ballot.

If you have any questions about the service provided by these long distance companies, simply call the appropriate customer service number listed next to each name on the ballot.

It should be noted that Yorkville Telephone Cooperative has no preference as to which long distance company you select. But we do encourage you to exercise your right to choose. We are required by law to randomly assign a long distance provider to customers who do not return a ballot.

There is no cost to you to have the long distance company of your choice connected to your telephone line.

Please return the enclosed ballot as soon as possible so that you will be able to continue the convenience of "1+" dialing. If you have any questions about this process, please call Yorkville Telephone Cooperative at (901) 643-6121.

Thank you,

"B"

3300 HOLCOMB BRIDGE ROAD, SUITE 286 NORCROSS, GA 30092-3238
VOICE 770.446.7242 FAX 770.446.7243
WWW.CHR SOLUTIONS.COM

ATLANTA • AUSTIN • DALLAS • KANSAS CITY • LUBBOCK • MINNEAPOLIS • PHOENIX • VANCOUVER

YORKVILLE TELEPHONE COOPERATIVE
2 YORKVILLE - NEBO RD.
YORKVILLE, TN. 38389

EQUAL ACCESS BALLOT
ACTION REQUIRED!

Main Billed Telephone Number: _____

FCC Regulations now require you to select a long distance company to provide your 1+ dialed long distance service for calls outside your local telephone company calling area. Please use one of the following equal access ballot options to make your equal access long distance company selection.

OPTION ONE - Please mark the long distance company you want to provide your 1+ long distance telephone service. Mark only one company from the list on the back.

OPTION TWO* - If you wish to use different long distance companies for each of your telephone numbers, use the list below to make your selection. Please print the four-digit code (from the list on the back of the ballot) to the right opposite each telephone number.

PLEASE SIGN AND RETURN BALLOT BY: FEBRUARY 3, 2000

Effective Date of Service. Your telephone (or telephones) will be connected with your chosen long distance company (or companies) on: **MARCH 31, 2000**

***OPTION TWO**

() If you have multiple telephone numbers and wish to assign each telephone number listed to different long distance companies, please indicate below.

PLEASE TURN BALLOT OVER TO SEE LIST OF PARTICIPATING CARRIERS

This company will make every effort to ensure that your telephone service is connected to the long distance company you choose. In the event your service is inadvertently connected to a different company we will assume liability only to the extent of connecting your chosen company at the earliest opportunity after you notify us.

Return to: EQUAL ACCESS BALLOT COORDINATOR
3300 HOLCOMB BRIDGE ROAD, SUITE 286
NORCROSS, GA 30092-3239

Signature _____ Date _____

REC'D TN
REGULATORY AUTH.
'99 APR 22 PM 2 27
OFFICE OF THE
EXECUTIVE SECRETARY

YORKVILLE TELEPHONE COOPERATIVE

IntraLATA Toll Dialing Parity Implementation Plan

March 31, 2000

Implementation Date

YORKVILLE TELEPHONE COOPERATIVE

Yorkville Tennessee

April 21, 1999

I. Purpose

Yorkville Telephone Cooperative (Yorkville) describes herein the process for implementing intraLATA toll Dialing parity in the Yorkville exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the participating telecommunications carrier of their choice for routing their intraLATA toll calls. Yorkville will associate with the LATA 468 for the purposes of providing toll dialing parity as well as its provision for interLATA equal access.

II. IntraLATA Environment

Yorkville customers can currently dial an access code to complete intraLATA toll calls to another carrier. After implementation of this intraLATA Toll Dialing Implementation Plan (the "Plan"), customers will be able to subscribe to the carrier of their choice for intraLATA as well as interLATA service (two PIC subscription capability). Customers will dial 1+ the area code and number to complete calls using their presubscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code (i.e., 101XXXX).

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA tolls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carrier's via an order from the Tennessee Public Service Commission. BellSouth Telecommunications Inc. ("BellSouth") currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by Yorkville intraLATA toll customers and to ensure that billing does not occur on these calls. Yorkville will continue to process toll-free intraLATA county-wide calls in this matter for toll customers after implementation of intraLATA toll dialing as long as technically feasible.

III. Implementation Schedule

Yorkville will provide intraLATA toll dialing parity in Tennessee on March 31, 2000 in conjunction with its proposed implementation of interLATA equal access.

IV. Carrier Selection Procedures

Yorkville will implement the full Two-PIC (Primary Interexchange Carrier) carrier selection methodology. With the full two-PIC methodology, customers will be able to subscribe to one telecommunications carrier for interLATA toll calls and subscribe to the same or a different participating telecommunications carrier, for all intraLATA toll calls. Orders for changes will be accepted and processed beginning on the implementation date.

Yorkville employees who communicate with the public, accept customer orders, and serve in customer service capacities will be trained to explain to customers the process for making PIC changes for intraLATA toll calls. Business Office personnel and the Customer Account Records system will be prepared to make changes in customer records based upon requests from customers or carriers and direct customers to their chosen intraLATA carriers. Processes will be in place to provide new customers with an opportunity to choose their intraLATA toll carrier from a list of available carriers.

¹ Concurrently with the filing of this Plan, Yorkville is filing with The Tennessee Regulatory Authority ("TRA") a Petition for Modification ("Petition") of the time frames for implementing intraLATA toll dialing parity that were prescribed by the Federal Communications Commission ("FCC") as well as the FCC's "default" carrier rules. The March 31, 2000 date noted herein is based on the assumption that the TRA will approve Yorkville's Petition for the reasons stated therein.

Existing Customers

Currently, BellSouth is the only subscribed intraLATA toll provider for existing customers in Yorkville local exchange area. On March 31, 2000 customers may subscribe to any telecommunications carrier offering intraLATA toll service in their exchange. Existing customers will remain with BellSouth until they affirmatively choose an intraLATA toll carrier. Customers may make this selection through their own initiative or as a result of the promotional marketing activities of participating intraLATA toll telecommunications carriers. Customers may communicate their selected carriers to Yorkville directly or through their selected carriers.

Subject to the proposed PIC Charge Waive Period discussed below, customers will be assessed a PIC change charge for changing their intraLATA carrier at a rate of \$5.00. When customers request a simultaneous change to the same carrier for their interstate and intrastate service, Yorkville will assess one PIC charge.

A charge will be established for unauthorized PIC changes submitted by carriers to Yorkville for end-user customers (slamming).

New Installation Customers

Yorkville customer contact representatives will be provided discussion guidelines that will provide a new customer with the following information:

1. Inform the customers that a choice of intraLATA toll providers is now available to him or her.
2. Offer to read the customer a list of available carriers in randomly generated order.
3. Advise the customer that various carriers provide intraLATA toll service.

Customers who do not make a positive choice for an intraLATA toll carrier will be notified that they will not be automatically defaulted to a carrier and will be required to dial an access code to place intraLATA toll calls until they make an affirmative choice for an intraLATA toll carrier.

PIC Charge Waive Period

Customers will be given a period of ninety (90) days within which to make one change of their preferred carrier at no cost to the customer. This waiver period will begin on March 31, 2000. The cost associated with this waiver will be recovered through the general cost recovery mechanism.

V. Customer Education/Notification

At the time of implementation, March 31, 2000, Yorkville will issue a press release announcing the availability of intraLATA 1+subscription. This press release will announce the opportunity to choose a primary intraLATA carrier and explain the 90 day waiver period from March 31, 2000 through June 30, 2000.

Yorkville will notify all existing end users via a direct mailing and a bill message regarding intraLATA subscription implementation and explain their opportunity to select an intraLATA carrier. The wording of the customer notification includes an explanation of the PIC change charge waiver period and is shown as Exhibit A. Customer telephone directories will be updated as new editions are published to reflect the opportunity for customers to choose an intraLATA toll carrier. After implementation, all new customers will be advised of intraLATA availability and requested to make an intraLATA carrier selection.

VI. Carrier Notification

Current interexchange carriers will be notified of Yorkville's interLATA implementation in compliance with the applicable interstate equal access requirements. In addition, interexchange carriers will be notified of Yorkville's intraLATA Toll Dialing Parity implementation via Certified U.S. Mail sixty days prior to its implementation with a subsequent notification at the time of implementation. Carriers that currently participate in interLATA toll will be assumed to be participants in the intraLATA toll market. Certified carriers who enter the market after implementation will be added to the list of participating carriers within 30 days of notifying Yorkville.

VII. Operator Services and Directory Assistance

Access to Operator Services and Directory Assistance will continue to be available through the customer's local exchange carrier or interLATA carrier. No industry standard exists for access to Operator Services and Directory Assistance unique to intraLATA services. For Operator Services, customers dial "0" to reach their local exchange operator and "00" to reach their interLATA operator. For Directory Assistance, customers dial "1-411" for accessing the local exchange Directory Assistance and dial "1-NPA-555-1212" for accessing their interLATA carrier's Directory Assistance.

VIII. Cost Recovery

In accordance with 47 C. F.R. Section 51.215, adopted in the FCC's Second Report and Order and Memorandum Opinion and Order in CC Docker No. 96-98, cost recovery for incremental cost of dialing parity, specific switch software, necessary hardware, signaling system upgrades and customer education cost that are specifically to implement dialing parity, will be implemented in a competitively neutral manner across all providers of telephone exchange service a telephone toll service in the area served by Yorkville. Incremental costs will be recovered from all carriers through a rate element based upon originating intrastate switched access minutes of use (MOUs) during the 4 years cost recovery period. Attached, as Exhibit B is a detailed explanation of the cost recovery methodology. An annual true-up will be conducted and reported to the TRA.

IX. Statement of compliance.

Yorkville will comply with all rules of the FCC and TRA.

Executed as of the 21th Day of April, 1999



W. T. Sims
General Manger of YTC
2 Nebo Yorkville Rd.
P O Box 8
Yorkville TN 38389
Phone: 901-643-6121

Exhibit A

BILL MESSAGE

"Yorkville implemented local toll 1+subscription service on March 31, 2000. You are now able to choose a local toll provider. Your current carrier will continue to provide this service for you or you may select another carrier. You may select the same provider as your interstate long distance service provider or you may select a different provider for each service. Your first selection prior to June 30, 2000 will be free."

DIRECT MAILING

IMPORTANT NOTICE ABOUT LOCAL TOLL SERVICE

"As of March 31, 2000, you are able to choose your provider of "1+" local toll service. This change allows you to remain with your current carrier or select a different long distance carrier for local toll calls. Please refer to the information pages in the front of your Yorkville Telephone directory under "Long Distance Service" for a description of toll calling areas.

If you would like to select a different carrier for your "1+" local toll service, you should contact that company. No action is necessary to keep current your provider for these local toll calls.

From March 31, 2000 until June 30, 2000 you will be able to change your local toll carrier one time without charge. There may be a charge for each subsequent change you make in local toll companies.

Exhibit B

**TENNESSEE
METHODOLOGY FOR RECOVERY OF COSTS
ASSOCIATED WITH
IMPLEMENTATION OF INTRALATA SUBSCRIPTION**

CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLata Subscription.

\$42,000.00

Step2: Identify estimated total Intrastate/IntraLATA minutes of use for the 4 year recovery period.

4,378,056

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$0.00096

ANNUAL TRUE-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.